

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA) Case No. 3:22-00327
v.) Hon. Aleta A. Trauger
HEATHER IDONI)

JOINT MOTION TO CONTINUE SENTENCING

COME NOW the United States of America and defendant Heather Idoni, by and through undersigned counsel, to respectfully request that the Court continue the sentencing date for Ms. Idoni, which is presently set for July 2, 2024. As scheduled, the sentencing date will prejudice Ms. Idoni's ability to prepare for a multidefendant trial of a separate matter scheduled to commence in the Eastern District of Michigan on August 6, 2024.

Ms. Idoni is presently in custody. On May 22, 2024, she was sentenced by the U.S. District Court for the District of Columbia on a separate matter to 24 months of incarceration. She is presently set for trial on August 6, 2024, in a seven-defendant case before the U.S. District Court for the Eastern District of Michigan, and is *pro se* in that matter. *See United States v. Zastrow, et al.*, 2:23-cr-20100 (E.D. Mich.). Upon information and belief, each time Ms. Idoni is transferred to a new holding facility, her trial preparation materials trail her by over a week. The parties have concerns that moving Ms. Idoni to the Middle District of Tennessee for the scheduled sentencing date in this matter may make it difficult for her to reach the Eastern District of Michigan in time for trial, much less reach that district with sufficient time to be reunited with her trial preparation materials and prepare for trial. In addition, a hearing on multiple motions *in limine* is presently scheduled in that case for July 8, 2024. The United States Marshals Service has informed counsel for the government that it would not be possible to get Ms. Idoni to the Eastern District of Michigan

in advance of this hearing date if she were to appear here for her sentencing as currently scheduled.

Accordingly, the parties jointly request that the Court continue Ms. Idoni's sentencing in this matter until a date on or after September 16, 2024, approximately 30 days after her trial in Michigan is expected to conclude.

Respectfully submitted,

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Defendant

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CERTIFICATE OF THE SERVICE

I certify that a true and correct copy of the foregoing was filed electronically and served electronically, via the CM/ECF electronically filing system on this 29th day of May, 2024, upon the following:

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